

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

OWEN W. BARNABY,  
Plaintiff,

v.

Hon. Robert J. Jonker  
Mag. Sally J. Berens  
Case No. 1:22-cv-01146

NILES CHARTER TOWNSHIP, et al.,  
Defendants.

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**EXPEDITED CONSIDERATION REQUESTED**

**TOWNSHIP DEFENDANTS' REQUEST TO EXTEND TIME TO  
FILE RESPONSE TO PLAINTIFF'S SECOND AMENDED COMPLAINT**

Defendants, Niles Charter Township and Niles Charter Township Board of Trustees, (together the "Township Defendants") request an order extending the time to file a response to the Plaintiff's Second Amended Complaint by twenty-eight (28) days or until January 26, 2023. The Township Defendants further request expedited consideration of this request under L.R. 7.1(e), as the current deadline to respond is December 29, 2022.

The request is based on the Brief in Support filed with the request and the facts, legal authorities and argument contained in the Brief in Support.

Respectfully submitted,

BAUCKHAM, THALL  
SEEBER, KAUFMAN & KOCHES, P.C.

DATED: December 29, 2022

BY: /s T. Seth Koches

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